

Before the
Federal Communications Commission
Washington, DC 20554

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In the Matter of)
)
Amendment of Part 95 of the) WT Docket 95-102
Commission's Rule to)
Establish a Very Short Distance)
Two-Way Voice Radio Service)

Comments to a Notice of Proposed Rule Making

Filed by:

Name: Greater Anchorage REACT, Inc.
Address: 719 E. 11th Avenue.
Anchorage AK 99501-4613

Date: September 22, 1995

The members of Greater Anchorage REACT, Incorporated are writing this letter as a group who, under our individual licenses, operate on the 462.675 mhz GMRS Emergency and Motorist Assistance Channel.

Our GMRS radio system is used in conjunction with REACT activities, for inter-team communications and contact with the general public when they need help.

We are writing to voice our objections over the proposed establishing of the "Family Radio Service" on current GMRS channels and channel pairs.

May we point out that the short range to which you refer is affected more by antenna height in UHF than is radio power.

Further, per a 1988 Commission ruling, GMRS is already a family radio service. Delicensing will no longer regulate who can and cannot subscribe to GMRS. The only ones to benefit from proposed delicensing will be the radio manufacturers, not the public. You exist to protect and to serve the public first and foremost.

It was also in 1988, that the Commission found that the manufacturer's sales promotions geared towards commercial-use markets was incompatible with personal and family use.....

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It has happened recently and in past years that we have had to put up with a myriad of interferences from users who refuse to use callsigns and even a local television station which, after a complaint to our now closed monitoring station, was issued a letter to repair the problem that plagued and threatened the continuity of our repeater.

We also object to the proposed mixing of licensed and unlicensed GMRS operators. Previous investigations by the FCC found such mixing to be unbearable and insupportable.

FRS should be secondary to true GMRS in order to protect it from the obvious potential interference. It is one of the FCC's purposes to protect legally licensed radio systems from just such a threat. You will be creating your own violation.

Could you not locate FRS in the unlicensed "Part 15" band? That would seem to us to be a logical place. It will make little difference to radio manufacturers what chip they install into future radios.

The proposed interstitial frequencies are located in between many, nationally established receiving channels. Proposals state they are in between transmitting channels. They are not.

Further, as we have had to listen to long background conversations and music radios when hand-held units or microphones were sat upon, we recommend that FRS radios be equipped with a "time-out" feature in the event the transmitter is inadvertently or intentionally keyed.

As it also frequently happens that other users fail to monitor the "shared" channel before they use it, another incorporation would be a muting defeat so that the transmitter was disabled until the receiver muting also had been disabled.

The plague of interference from other users of GMRS for our use in REACT activities prompts us to ask if the rules could be written so that it would be a manufacturing requirement for FRS equipment to employ an AUTOMATIC TRANSMITTER IDENTIFIER (ATIS)?

As with certain types of services where restrictions apply for joint-use, it is evident the FCC has no regard for the importance of current user's communications needs by proposing to allow "Tom Dick and Harry" to join in.

We further demand that the FCC listen to suggestions and complaints from the thousands in the GMRS community. Who

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better to offer ideas for improvements to equipment and licensing procedures?

Being REACT Emergency Channel 9 Monitors, we get frustrated listening to foul language, discourteous operators and suffering the agony of illegally powered stations disrupting not only The FCC designated Emergency and Motorist Assistance Channel, but all 40 channels.

Our pleas to help us continue to help the public are answered by replies such as, "We are too busy for CB." or "We don't have enough personnel at this time." Too busy to chase down an un-licensed operator?

Will we ever see a time when this service is cleaned up? And now, with no local monitoring station and a lack of enforcement agents, the only hope we as GMRS users have is the non-creation of the problem before it starts. This can only be done by the FCC listening to us and applying some forethought to the ins and outs of FRS and the proposed consequences it will have on GMRS.

In the NPRM proposal, there is a claim that a number of factors will limit the interference potential of FRS units. This is totally without basis. It will be entirely insufficient for the 12.5 khz separation from the primary GMRS channels because the innovation employed has an emission envelope of 18 to 20 khz.

Lastly, it was the FCC's own ruling and we quote from the FCC Report and Order, PR Docket 87-265 at par.16: "We seek to discourage the proliferation of what are typically part 90 (business and commercial) users of the GMRS. The GMRS is not and should not become the "other" Business Radio Service.

We ask you to leave GMRS alone. There is nothing wrong with it and, you are certainly not improving it. We have nowhere else to go for quality and disciplined communications. We would surely be plagued by the Sears and Roebuck CB walkie talkie once again!